

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Chesterfield County  
The Honorable J. Michael Baxley, Circuit Court Judge  
Appellate Case No. 2013-000148

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THE STATE OF SOUTH CAROLINA,

v.

GRAHAM FRANKLIN DOUGLAS,

APPELLANT,

RESPONDENT.

RECEIVED

JUL 05 2013

SC Court of Appeals

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MOTION FOR SECOND EXTENSION TO FILE  
APPELLANT'S RESPONSE TO MOTION  
TO DISMISS APPEAL

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The undersigned counsel would respectfully request a six (6) day extension in which to file the Appellant's Response to Motion to Dismiss Appeal in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

Appellant's response was initially due on June 28, 2013. Appellant submitted a letter on June 28, 2013 requesting an extension of four days to file its response to the Motion to Dismiss Appeal. That request would make Appellant's Response due today, July 2, 2013.

On Monday, July 1, 2013, counsel for Appellant received a second Motion to Dismiss from Respondent. This second motion, served by U.S. mail on June 28, 2013, raises one argument that is similar in some respects to the one raised by Respondent in the first Motion to Dismiss. It also raises a second argument that was not raised in the first Motion.

Counsel for Appellant would like to consolidate the responses to both motions into one. Thus, Appellant respectfully requests a six day extension for the filing of the response to the first Motion to Dismiss. This would make the response to the first Motion due on Monday, July 8, 2013, the same day as the second Motion to Dismiss.

This request is made in good faith, and not for the purposes of delay.

WHEREFORE, premises considered, counsel hereby respectfully requests a six (6) day extension of time to serve and file the Response to Motion to Dismiss Appeal.

Respectfully submitted,

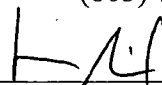
ALAN WILSON  
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BY:



ALPHONSO SIMON, JR.,

ATTORNEYS FOR APPELLANT

July 2, 2013.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Chesterfield County  
The Honorable J. Michael Baxley, Circuit Court Judge  
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THE STATE OF SOUTH CAROLINA,

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GRAHAM FRANKLIN DOUGLAS,

RESPONDENT.

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**PROOF OF SERVICE**

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I, Alphonso Simon, Jr., of Counsel for the Appellant, hereby certify that I have served two (2) copies of the within Motion for Second Extension to File Response to Motion to Dismiss Appeal via United States Mail, first class, postage prepaid to his attorney of record, S. Jahue Moore, Sr., Esq., Moore, Taylor & Thomas, P.A., P.O. Box 5709, West Columbia, South Carolina 29171, and to M. W. Cockrell, III, Cockrell Law Firm, P.C., Olde Towne Centre, Barrister Building, 159 Main Street, Chesterfield, SC 29709.

I further certify that all parties required by Rule to be served have been served.

This 2<sup>nd</sup> day of July, 2013.



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